

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,

Plaintiffs,

v.

GREGORY W. ABBOTT, et al.,

Defendants.

Consolidated Civil Action No.:
5:21-CV-00844-XR

INTERVENOR-DEFENDANTS' SUPPLEMENTAL DISCLOSURES

Pursuant to Rule 26(e)(1) of the Federal Rules of Civil Procedure and the parties' Stipulation Regarding Disclosure of General Election Witnesses (Dkt. No. 512), Intervenor-Defendants the Harris County Republican Party, Dallas County Republican Party, Republican National Committee, National Republican Senatorial Committee, and National Republican Congressional Committee hereby provide these Supplemental Disclosures. Intervenor-Defendants make these disclosures based on information reasonably and presently available to them and based on the discovery taken to date. Because discovery remains ongoing, Intervenor-Defendants reserve the right under Rule 26(e) to modify, amend, retract, or supplement these disclosures as additional information and evidence becomes available. Intervenor-Defendants further reserve the right to call any witness or present any document or tangible thing at trial that is identified through further investigation or discovery.

I. Individuals Likely To Have Discoverable Information That Intervenor-Defendants May Use To Support Their Defenses (Rule 26(a)(1)(A)(i)).

Intervenor-Defendants incorporate by reference in these disclosures the names of any and all persons (including individuals and entities) disclosed by Plaintiffs, Defendants, or intervenors.

Intervenor-Defendants further incorporate by reference the names of any and all persons (including individuals and entities) identified by Plaintiffs, Defendants, intervenors, or any third party in any Responses to any Interrogatories, Responses to Document Requests, or Responses to Requests for Admission. Intervenor-Defendants reserve the right to supplement and/or amend these disclosures as discovery progresses and to seek information from such disclosed persons and entities to support their defenses.

February 24, 2023

/s/ John M. Gore

John M. Gore
E. Stewart Crosland*
Stephen J. Kenny*
Charles E.T. Roberts
JONES DAY
51 Louisiana Avenue, N.W.
Washington, D.C. 20001
Phone: (202) 879-3939
Fax: (202) 626-1700
jmgore@jonesday.com
scrosland@jonesday.com
skenny@jonesday.com
cetroberts@jonesday.com

Counsel for Intervenor-Defendants

**Pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2023, the foregoing document was served via CM/ECF on all counsel of record.

/s/ John M. Gore

Counsel for Intervenor-Defendants